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June 3, 1996

JUN 3 1996

**Mr. William F. Caton, Acting Secretary
Federal Communications Commission
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Washington, D. C. 20554**

FEDERAL COMMUNICATIONS COMMISSION

In the Matter of:

DOCKET FILE COPY ORIGINAL

**Implementation of the Local Competition
Provisions in the Telecommunications Act
of 1996 - Dialing Parity, Number Portability,
Notice of Technical Changes, Access to
Rights of Way**

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CC Docket No. 96-98

Dear Mr. Caton:

Enclosed are an original and sixteen copies of the Reply Comments of Cincinnati Bell Telephone Company in the above referenced proceeding. A duplicate original copy of this letter and attached Reply Comments is also provided. Please date stamp this as acknowledgment of its receipt and return it. Questions regarding these Reply Comments may be directed to Ms. Patricia Rupich at the above address or by telephone on (513) 397-6671.

Sincerely,

David L. Meier

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Enclosure

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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JUN 3 1996

In the Matter of)

Implementation of the Local)
Competition Provisions in the)
Telecommunications Act of 1996)

CC Docket No. 96-98

(Dialing Parity / Number Administration /)
Notice of Technical Changes / Access to)
Rights-of-Way))
)

REPLY COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY

SUMMARY

Cincinnati Bell Telephone Company ("CBT"), an independent, mid-size local exchange carrier, submits these reply comments in response to the numerous comments filed in this proceeding relating to dialing parity, number administration, notice of technical changes and access to rights of way.

CBT asserts that a mandated Multi-PIC methodology at this time is not possible given existing technology, and therefore, recommendations to mandate that methodology are unrealistic. CBT submits that the decision on the most effective methodology to be employed to achieve dialing parity is best left to the states. CBT concurs in the comments opposing balloting, particularly with respect to the customer confusion inherent in the balloting process.

CBT also asserts that branding should not be mandated. It should be the subject of negotiations between the parties where the technical feasibility and cost of the specific request can be determined.

CBT submits that to the extent LECs are required to make reasonable accommodations for access by competitors, then LECs must be allowed to recover the costs incurred in making the accommodations.

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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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REPLY COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY

I. INTRODUCTION

Cincinnati Bell Telephone Company ("CBT"), an independent, mid-size local exchange carrier, submits these reply comments in response to the numerous comments filed in this proceeding¹ relating to dialing parity, number administration, notice of technical changes and access to rights of way.

CBT urges the Commission to consider the abilities of all LECs, particularly small and mid-size companies when implementing rules through this proceeding. The Commission should not burden LECs with unnecessary regulations which will hamper the development of a truly competitive telecommunications market as envisioned by the Telecommunications Act of 1996

¹ In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, Case No. 96-98, Notice of Proposed Rulemaking, released April 19, 1996.

(the "Act").² CBT is concerned that the recommendations of some commenters in this proceeding would not only distort the competitive market, but could lead to unnecessary customer confusion.³

II. DIALING PARITY

A. Multi-PIC Methodology Should Not Be Mandated.

Some commenters have urged the Commission to mandate a "multi-PIC" methodology as the national standard in achieving dialing parity.⁴ Multi-PIC at this time is not possible given existing technology, and therefore, recommendations to mandate that methodology are unrealistic. As CBT and others point out in their comments, the technology necessary to support a multi-PIC methodology has not yet been developed.⁵

CBT submits that the decision on the most effective methodology to be employed to achieve dialing parity is best left to the states, as state commissions are most familiar with customer needs and demands, as well as the network capabilities in their respective states. Indeed, efforts to achieve intraLATA toll dialing parity are already underway in many states.

² Telecommunications Act of 1996, Pub. L. 104-104.

³ See e.g., Comments of Telecommunications Resellers Association ("TRA") at p. 5, 8; Comments of American Communication Services, Inc. ("ACSI") at p. 10.

⁴ See, e.g., Comments of TRA at pp.3-4; Comments of General Services Administration/Department of Defense ("GSA/DOD") at p. 4.

⁵ See, e.g., Comments of Ameritech at pp.16-20; Comments of Pacific Telesis Group at pp. 11-12; Comments of US West at pp. 5-6; Comments of AT&T at p. 5, n. 6; Comments of MCI at p. 5.

However, if the Commission determines that a national standard is necessary, CBT agrees with Sprint that Modified 2-PIC should be selected as fulfilling the minimum requirements.⁶

Many comments were offered regarding an implementation schedule for dialing parity or intraLATA presubscription. Demands for full implementation within 6 months⁷ or by January 1, 1997⁸ are totally unrealistic given the multitude of other demands being placed on LECs as a result of the Act. MFS offers a more reasonable approach to implementation in its comments with its discussion of the efforts already underway in many states. MFS proposes that LECs implement intraLATA presubscription within one year of the effective date of the rules, or by the date previously ordered by a state commission, whichever is *later* (emphasis added).⁹ CBT also believes that methods for determining cost recovery for intraLATA presubscription should be left to the states to determine.

B. Balloting Should Be Rejected.

CBT concurs in the comments of the Staff of the Public Utilities Commission of Ohio¹⁰ and others¹¹ opposing balloting, particularly with respect to the customer confusion inherent in the balloting process. Carrier selection should be left up to the individual customer, with

⁶ Comments of Sprint at pp. 5-6.

⁷ Comments of MCI at p. 6.

⁸ Comments of AT&T at p. 5.

⁹ Comments of MFS at p. 6.

¹⁰ Comments of PUCO Staff at p. 7.

¹¹ See e.g., Comments of Ameritech at pp. 20-21; Comments of Sprint at p.7; Comments of GSA/DOD at pp. 5-6; Comments of Lincoln Telephone and Telegraph at p. 3; Comments of Pacific Telesis Group at p. 13.

marketing to be done by the competing carriers. Nothing is gained from balloting. It will only result in customer confusion, dissatisfaction, and needless expense.

CBT supports the position taken by most parties¹² that the Commission should not require any specific form of customer notification. This requirement is not demanded by the Act, and should be left up to the carriers who are interested in obtaining or maintaining the customers. Any regulation of customer notification processes should be left to state commissions. The recommendations of ACSI¹³ for a national task force to design a bill insert which LECs must then send out for two years, instructing their customers on how to take their business elsewhere, are simply unreasonable, in that such a process would impose the marketing costs for non-LECs on LECs.

C. Branding Should Not Be Mandated.

AT&T has raised the issue of the branding of calls in its comments in Part One and Part Two of this proceeding.¹⁴ AT&T is also waging an intense campaign at the state level to convince state regulators that branding should be required on local operator services

¹² See e.g., Comments of AT&T at pp. 6-7; Comments of MFS Communications Co. at pp. 6-7; Comments of SBC Communications Inc. at p. 4; Comments of Pacific Telesis Group at p. 13; Comments of GTE Service Corp. at pp. 12-13.

¹³ Comments of ACSI at p.10.

¹⁴ Comments of AT&T, Part One, Docket No. 96-98, p. 81, n. 123; Comments of AT&T, Part Two, at p.9, n.12.

("0-" and "0+"), local directory assistance ("411") and call completion, consumer repair services ('611'), and busy line verification/interrupt services purchased for resale.¹⁵ Branding is not a public interest issue. Operator services, directory assistance, and repair are available from companies other than LECs.

Call branding can be provided, though not without considerable added effort and expense, to facilities-based providers who route traffic from their networks to the incumbent LEC's network by trunk group. Providing branding for resold services at the line number level is extremely difficult within the limits of the public switched network. When dealing with multiple resellers, there is no simple method for the incumbent LEC to determine by individual line number which brand should be applied when a call originated on its own network by a reseller's customer reaches its destination at directory assistance, operator services, or repair. The complexity and difficulty of the problem of brand identification by line number are compounded as the number of resellers in a LEC's area grows. CBT asserts that branding should not be mandated. It should be the subject of negotiations between the parties where the technical feasibility and cost of the specific request can be determined.

¹⁵ See, e.g., Testimony of Mike Guedel, Manager-Local Infrastructure and Access Management, AT&T Communications of the Southern States, Inc., and attached illustrative Local Services Resale Tariff, filed in Kentucky Public Service Commission Administrative Case No. 355, February 26, 1996; illustrative Total Wholesale Service Tariff, Appendix B to Initial Comments of AT&T Communications of Ohio, Inc., filed December 14, 1995, in Public Utilities Commission of Ohio Case No. 95-845-TP-COI.

III. ACCESS TO RIGHTS OF WAY

A. Notification Period for Modifications Must Be Reasonable.

Contrary to CBT's request that the Commission's rules in this proceeding be flexible enough to accommodate the differences in the technological and financial ability of LECs or in the geographic and demographic characteristics of a region, some commenters have recommended specific, rigid time frames for implementation that are problematic. MCI, for example, recommends that the owner of a pole, duct, or conduit be required to provide written notification to other carriers that have an attachment to the structure at least 180 days in advance of any modification.¹⁶ In many cases, structure owners may not know that far in advance that modifications are required. This is particularly true for modifications dictated by a government agency (e.g., the state highway department often requires that a pole be moved to accommodate a highway construction project). Many other commenters recommend 90¹⁷ or 60¹⁸ day notification. CBT asserts that a 60 day notification period realistically reflects most situations that may result in modifications and should provide ample opportunity for the other users of that structure to make the necessary modifications to their facilities.

B. LECs Must Be Able To Recover The Costs Of Adding Capacity.

In its comments, CBT asserted that if LECs are required to make reasonable accommodations for access by competitors, then LECs must be allowed to recover the costs

¹⁶ Comments of MCI at p. 22.

¹⁷ Comments of MFS at p. 12; Comments of Time Warner at p. 15.

¹⁸ Comments of AT&T at p. 22.

incurred in making the accommodations.¹⁹ Failure to allow a LEC to recover its costs may be an unconstitutional taking of LEC property.

AT&T recommends that telecommunications carriers seeking attachments to LEC poles, ducts, or conduits pay only a proportion of the total cost of adding any necessary extra capacity. Under AT&T's recommendation, the requesting carrier's payment for the additional capacity would be based on how much of the newly available space is being used by the requesting carrier, rather than the overall cost involved in creating the additional capacity.²⁰ The LEC would be required to pay all remaining costs. AT&T argues that the LEC will be able to recover the remaining costs from other entities that will obtain attachments in the remaining spaces.²¹ However, there is no guarantee that the additional unused space will ever be used by the LEC or another tenant.

Unfortunately, due to the physical design of these structures, it is not practical and often not possible for the LEC to increase capacity in single increments to exactly meet the requesting carrier's needs. Poles, for example, come only in certain sizes. Thus, if a larger pole is required to accommodate another carrier's request, it is unlikely that the requesting carrier will occupy all of the additional space on the new pole. The LEC, however, has no choice but to add the larger pole, while not being guaranteed that the excess capacity existing on the larger pole will ever be used by other tenants or the LEC itself. To require the requesting carrier to

¹⁹ Comments of CBT at pp. 7, 8.

²⁰ Comments of AT&T at p. 19.

²¹ Comments of AT&T at p. 19.

pay based only on the proportion of new space used by the requesting carrier could subject the LEC to significant losses.

In other situations, such as underground conduit systems that are at capacity, it may be possible to add only the duct space requested by the carrier, but it would not be cost efficient to do so. A LEC may add a four duct conduit to accommodate a request for one duct from another carrier, because projected future demand and the physical design of the system dictate that a four duct system be built. However, the remaining ducts may never actually be used. The bulk of the cost associated with the expansion would be the construction (rather than materials) of the conduit system, which would likely vary little regardless of the number of ducts included. Under AT&T's proposal, the requesting carrier would pay only one-fourth of the total cost of the project, which would likely be significantly less than if the conduit system were constructed solely to meet their request for one duct. If the AT&T approach were adopted, LECs would be forced to design and construct conduit systems that exactly corresponded to the request, in order to ensure that their costs were recovered. Such a system will lead to economic inefficiencies.

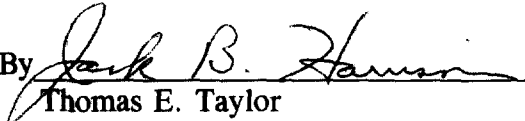
Therefore, CBT recommends that the Commission reject AT&T's recommendation and allow cost recovery for additional capacity to be negotiated between the LEC and the requesting carrier based on the circumstances of each specific request.

IV. CONCLUSION

CBT respectfully requests that the Commission carefully consider its comments filed in this proceeding as the Commission develops rules and regulations relating to the issues of dialing parity, access to rights-of-way, number administration and notice of technical changes.

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Dated: June 3, 1996

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing **Reply Comments of Cincinnati Bell Telephone Company** have been delivered by first class United States Mail, postage prepaid, on June 3, 1996, to the persons on the attached service list.



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